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JOHN A. SANCHEZ
Lieutenant Governor

**NEW MEXICO
ENVIRONMENT DEPARTMENT**

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RYAN FLYNN
Cabinet Secretary
BUTCH TONGATE
Deputy Secretary

Certified Mail - Return Receipt Requested

July 22, 2016

Mr. Fernando Garcia, Mayor
Town of Springer
Post office Box 488
Springer, New Mexico 87747

**RE: Minor Industrial, SIC 4941, NPDES Compliance Evaluation Inspection, Town of Springer
Water Treatment Plant, NM0030627, July 7, 2016**

Dear Mr. Garcia:

Enclosed please find a copy of the report and check list for the referenced inspection that the New Mexico Environment Department (NMED) conducted at your facility on behalf of the U.S. Environmental Protection Agency (USEPA). This inspection report will be sent to the USEPA in Dallas for their review. These inspections are used by USEPA to determine compliance with the National Pollutant Discharge Elimination System (NPDES) permitting program in accordance with requirements of the federal Clean Water Act.

You are encouraged to review the inspection report, required to correct any problems noted during the inspection, and advised to modify your operational and/or administrative procedures, as appropriate. If you have comments on or concerns with the basis for the findings in the NMED inspection report, please contact us (see the address below) in writing within 30 days from the date of this letter. Further you are encouraged to notify in writing both the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

Racquel Douglas
US Environmental Protection Agency, Region VI
Enforcement Branch (6EN-WM)
Fountain Place
1445 Ross Avenue
Dallas, Texas 75202-2733

Bruce Yurdin
New Mexico Environment Department
Surface Water Quality Bureau
Point Source Regulation Section
P.O. Box 5469
Santa Fe, New Mexico 87502

If you have any questions about this inspection report, please contact Sandra Gabaldon at (505) 827-1041 or at sandra.gabaldon@state.nm.us.

Sincerely,

/s/ Bruce J. Yurdin

Bruce J. Yurdin
Program Manager
Point Source Regulation Section
Surface Water Quality Bureau

cc: Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail
Racquel Douglas, USEPA (6EN-WM) by e-mail
Gladys Gooden-Jackson (6EN-WC) by e-mail
Brent Larsen, USEPA (6WQ-PP) by e-mail

NMED District II, Robert Italiano, Manager, by e-mail



Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 <input type="text" value="N"/> 2 <input type="text" value="5"/> 3 <input type="text" value="N"/> <input type="text" value="M"/> <input type="text" value="0"/> <input type="text" value="0"/> <input type="text" value="3"/> <input type="text" value="0"/> <input type="text" value="6"/> <input type="text" value="2"/> <input type="text" value="7"/> 11 12 <input type="text" value="1"/> <input type="text" value="6"/> <input type="text" value="0"/> <input type="text" value="7"/> <input type="text" value="0"/> <input type="text" value="7"/> 17 18 <input type="text" value="C"/> 19 <input type="text" value="S"/> 20 <input type="text" value="1"/>					
<input type="text" value="W"/> <input type="text" value="A"/> <input type="text" value="T"/> <input type="text" value="E"/> <input type="text" value="R"/> <input type="text" value="T"/> <input type="text" value="R"/> <input type="text" value="E"/> <input type="text" value="A"/> <input type="text" value="T"/> <input type="text" value="M"/> <input type="text" value="E"/> <input type="text" value="N"/> <input type="text" value="T"/>					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 <input type="text" value="1"/> 69	70 <input type="text" value="3"/>	71 <input type="text" value="N"/>	72 <input type="text" value="N"/>	73 <input type="text" value=""/>	74 75 <input type="text" value=""/>

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) Town of Springer Water Treatment Facility From I-25 N, take exit 412, continue ~0.9 miles on Maxwell Avenue, then 0.3 miles on Railroad Avenue, turn west on NM 468, travel 1.9 miles, turn north on access road. Facility located on the right. COLFAX COUNTY	Entry Time /Date 0950 Hours / July 7, 2016	Permit Effective Date November 1, 2013
	Exit Time/Date 1200 Hours / July 7, 2016	Permit Expiration Date October 31, 2018
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Laura Danielson, Water Supervisor, (575) 483-2682 / tos_water@yahoo.com	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number Mr. Fernando Garcia, Mayor / (575) 483-2682 / (575) 483-2910 606 Colbert Avenue Post Office Box 488 Springer, NM 87714	Outfall 001: Latitude N. 36.392030° Longitude W. -104.625260° SIC 4941	
Contacted Yes <input type="checkbox"/> No <input type="checkbox"/>		

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

<input type="text" value="S"/> Permit	<input type="text" value="S"/> Flow Measurement	<input type="text" value="M"/> Operations & Maintenance	<input type="text" value="N"/> CSO/SSO
<input type="text" value="M"/> Records/Reports	<input type="text" value="S"/> Self-Monitoring Program	<input type="text" value="N"/> Sludge Handling/Disposal	<input type="text" value="N"/> Pollution Prevention
<input type="text" value="S"/> Facility Site Review	<input type="text" value="N"/> Compliance Schedules	<input type="text" value="N"/> Pretreatment	<input type="text" value="N"/> Multimedia
<input type="text" value="N"/> Effluent/Receiving Waters	<input type="text" value="U"/> Laboratory	<input type="text" value="N"/> Storm Water	<input type="text" value="N"/> Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

Please see checklist and further explanations for details of findings

Name(s) and Signature(s) of Inspector(s) /s/ Sandra Gabaldon Sandra Gabaldon	Agency/Office/Telephone/Fax NMED/SWQB/(505) 827-1041/(505) 827-0160	Date 07/22/2016
Signature of Management QA Reviewer /s/ Bruce Yurdin for Jennifer Foote, Municipal Team Lead	Agency/Office/Phone and Fax Numbers NMED/SWQB/(505) 827-0596/(505) 827-0160	Date 07/22/2016

TOWN OF SPRINGER WATER TREATMENT PLANT		PERMIT NO. NM0030627	
SECTION A – PERMIT VERIFICATION			
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS		X S M U NA (FURTHER EXPLANATION ATTACHED <u>NO</u>)	
DETAILS: The Permit is issued to “City of Springer Water Treatment Plant”. The correct name is “Town of Springer”			
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE		Y X N NA	
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES		O Y N X NA	
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT		X Y N NA	
4. ALL DISCHARGES ARE PERMITTED		X Y N NA	
SECTION B – RECORDKEEPING AND REPORTING EVALUATION			
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT.		O S X M U NA (FURTHER EXPLANATION ATTACHED <u>YES</u>)	
DETAILS:			
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRs.		Y N NA	
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE.		O S M U NA	
a) DATES, TIME(S) AND LOCATION(S) OF SAMPLING		O Y X N NA	
b) NAME OF INDIVIDUAL PERFORMING SAMPLING		X Y N NA	
c) ANALYTICAL METHODS AND TECHNIQUES.		O Y X N NA	
d) RESULTS OF ANALYSES AND CALIBRATIONS.		X Y N NA	
e) DATES AND TIMES OF ANALYSES.		X Y N NA	
f) NAME OF PERSON(S) PERFORMING ANALYSES.		X Y N NA	
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE.		X S M U NA	
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR.		O S X M U NA	
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA.		O Y N X NA	
SECTION C – OPERATIONS AND MAINTENANCE			
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED.		S X M U NA (FURTHER EXPLANATION ATTACHED <u>YES</u>)	
DETAILS:			
1. TREATMENT UNITS PROPERLY OPERATED.		X S M O U NA	
2. TREATMENT UNITS PROPERLY MAINTAINED.		X S M O U NA	
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED .		X S M U NA	
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE.		X S M O U NA	
5. ALL NEEDED TREATMENT UNITS IN SERVICE		X S M O U NA	
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED.		S X M O U NA	
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED.		X S M U NA	
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE.		X Y N NA	
STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED.		X Y O N NA	
PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED.		O Y X N NA	

TOWN OF SPRINGER WATER TREATMENT PLANT		PERMIT NO. NM30627	
SECTION C – OPERATIONS AND MAINTENANCE (CONT'D)			
9. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR?		<input type="radio"/> Y <input checked="" type="radio"/> N <input type="radio"/> NA	
IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED?		<input type="radio"/> Y <input type="radio"/> N <input checked="" type="radio"/> NA	
HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS?		<input type="radio"/> Y <input type="radio"/> N <input checked="" type="radio"/> NA	
10.HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT?		<input type="radio"/> Y <input checked="" type="radio"/> N <input type="radio"/> NA	
IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT?		<input type="radio"/> Y <input type="radio"/> N <input checked="" type="radio"/> NA	
SECTION D – SELF-MONITORING			
PERMITTEE SELF-MONITORING MEETS PERMIT REQUIREMENTS. DETAILS:		<input checked="" type="radio"/> S <input type="radio"/> M <input type="radio"/> U <input type="radio"/> NA (FURTHER EXPLANATION ATTACHED <u>NO</u>).	
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT.		<input checked="" type="radio"/> Y <input type="radio"/> N <input type="radio"/> NA	
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES.		<input checked="" type="radio"/> Y <input type="radio"/> N <input type="radio"/> NA	
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT.WET testing 24-hour composite. Once per permit term. Permit expires in 2018, sample has not yet been taken.		<input type="radio"/> Y <input type="radio"/> N <input checked="" type="radio"/> NA	
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT.		<input checked="" type="radio"/> Y <input type="radio"/> N <input type="radio"/> NA	
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT.		<input checked="" type="radio"/> Y <input type="radio"/> N <input type="radio"/> NA	
6. SAMPLE COLLECTION PROCEDURES ADEQUATE		<input checked="" type="radio"/> Y <input type="radio"/> N <input type="radio"/> NA	
a) SAMPLES REFRIGERATED DURING COMPOSITING.		<input checked="" type="radio"/> Y <input type="radio"/> N <input type="radio"/> NA	
b) PROPER PRESERVATION TECHNIQUES USED.		<input checked="" type="radio"/> Y <input type="radio"/> N <input type="radio"/> NA	
c) CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136.3.		<input checked="" type="radio"/> Y <input type="radio"/> N <input type="radio"/> NA	
7. IF MONITORING AND ANALYSES ARE PERFORMED MORE OFTEN THAN REQUIRED BY PERMIT, ARE THE RESULTS REPORTED IN PERMITTEE'S SELF-MONITORING REPORT?		<input type="radio"/> Y <input type="radio"/> N <input checked="" type="radio"/> NA	
SECTION E – FLOW MEASUREMENT			
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS. DETAILS: Permit requires an "estimate" effluent flow be reported.		<input checked="" type="radio"/> S <input type="radio"/> M <input type="radio"/> U <input type="radio"/> NA (FURTHER EXPLANATION ATTACHED <u>NO</u>)	
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED. TYPE OF DEVICE <u>Estimate Flow</u>		<input checked="" type="radio"/> Y <input type="radio"/> N <input type="radio"/> NA	
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED.		<input type="radio"/> Y <input type="radio"/> N <input checked="" type="radio"/> NA	
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED.		<input type="radio"/> Y <input type="radio"/> N <input checked="" type="radio"/> NA	
4. CALIBRATION FREQUENCY ADEQUATE.		<input type="radio"/> Y <input type="radio"/> N <input checked="" type="radio"/> NA	
RECORDS MAINTAINED OF CALIBRATION PROCEDURES.		<input type="radio"/> Y <input type="radio"/> N <input checked="" type="radio"/> NA	
CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE.		<input type="radio"/> Y <input type="radio"/> N <input checked="" type="radio"/> NA	
5. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE.		<input type="radio"/> Y <input type="radio"/> N <input checked="" type="radio"/> NA	
6. HEAD MEASURED AT PROPER LOCATION.		<input type="radio"/> Y <input type="radio"/> N <input checked="" type="radio"/> NA	
7. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES.		<input type="radio"/> Y <input type="radio"/> N <input checked="" type="radio"/> NA	
SECTION F – LABORATORY			
PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS. DETAILS:		<input type="radio"/> S <input type="radio"/> M <input checked="" type="radio"/> U <input type="radio"/> NA (FURTHER EXPLANATION ATTACHED <u>YES</u>)	
1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(b) FOR SLUDGES)		<input type="radio"/> Y <input checked="" type="radio"/> N <input type="radio"/> NA	

TOWN OF SPRINGER WATER TREATMENT PLANT						PERMIT NO. NM30627	
SECTION F - LABORATORY (CONT'D)							
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED						Y N X NA	
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT.						X S O M U NA	
4. QUALITY CONTROL PROCEDURES ADEQUATE.						O S M X U NA	
5. DUPLICATE SAMPLES ARE ANALYZED. 0 % OF THE TIME.						O Y X N NA	
6. SPIKED SAMPLES ARE ANALYZED. 0 % OF THE TIME.						Y X N O NA	
7. COMMERCIAL LABORATORY USED.						X Y N NA	
LAB NAME Hall Environmental Raton Waterwater Treatment Facility Laboratory							
LAB ADDRESS 4901 Hawkins, NE; Suite D; Albuquerque, NM 87109 420 Hereford Avenue; Raton, NM 87740							
PARAMETERS PERFORMED Total Aluminum; Copper, Nickel, Zinc TSS							
SECTION G - EFFLUENT/RECEIVING WATERS OBSERVATIONS. O S M O U X NA (FURTHER EXPLANATION ATTACHED NO)							
OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOAT SOL.	COLOR	OTHER
001	NO DISCHARGE	NO DISCHARGE	NO DISCHARGE	NO DISCHARGE	NO DISCHARGE	NO DISCHARGE	
RECEIVING WATER OBSERVATIONS No discharge during inspection.							
SECTION H - SLUDGE DISPOSAL							
SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS.						S M U X NA (FURTHER EXPLANATION ATTACHED NO).	
DETAILS: Water Treatment Plant – No sludge disposal.							
1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY.						S M U NA	
2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503.						S M U NA	
3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: N/A (e.g., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE)							
SECTION I - SAMPLING INSPECTION PROCEDURES (FURTHER EXPLANATION ATTACHED).							
1. SAMPLES OBTAINED THIS INSPECTION.						Y N X NA	
2. TYPE OF SAMPLE OBTAINED							
GRAB COMPOSITE SAMPLE METHOD FREQUENCY							
3. SAMPLES PRESERVED.						Y N NA	
4. FLOW PROPORTIONED SAMPLES OBTAINED.						Y N NA	
5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE.						Y N NA	
6. SAMPLE REPRESENTATIVE OF VOLUME AND MATURE OF DISCHARGE.						Y N NA	
7. SAMPLE SPLIT WITH PERMITTEE.						Y N NA	
8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED.						Y N NA	
9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT.						Y N NA	

Town of Springer Water Treatment Facility
NPDES Permit No.: NM0030627
Compliance Evaluation Inspection
Date of Inspection: July 7, 2016

Introduction:

On July 7, Sandra Gabaldón accompanied by Daniel Valenta, both of the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB) conducted a Compliance Evaluation Inspection (CEI) at the Town of Springer Water Treatment Plant (WTP). The Town of Springer WTP has a design flow capacity of 0.28 MGD (million gallons per day) and is classified as a minor industrial discharger under the federal Clean Water Act, Section 402, of the National Pollutant Discharge Elimination System (NPDES) permit program. It is assigned NPDES permit number NM0030627, which regulates discharge of treated backwash water from outfall 001 to an unnamed tributary, thence to the Cimarron River in Segment 20.6.4.306 *State of New Mexico Standards for Interstate and Intrastate Surface Waters, 20.6.4 New Mexico Administrative Code (NMAC)*. This segment includes the designated uses of irrigation, warmwater aquatic life, livestock watering, wildlife habitat and primary contact.

The NMED performs a certain number of CEIs for the U.S. Environmental Protection Agency (USEPA), Region VI, under the NPDES permit program, in accordance with the federal Clean Water Act. USEPA uses these inspections to determine compliance with the NPDES permit program. This inspection report is based on information provided by the permittee's representatives, observations made by the NMED inspector, and records and reports kept by the permittee and/or NMED.

Upon arrival at the Town of Springer Administrative offices at approximately 0920 hours, the inspectors met Ms. Laura Danielson, Water Supervisor. During the entrance interview, the inspector presented her credentials, made introductions and explained the purpose of the inspection. A review of records from previous discharges was done prior to touring the water treatment plant and the newly remodeled dam.

A tour of the facility commenced after review of records. Ms. Danielson was unable to tour the facility with the inspectors due to an illness. Ms. Danielson waited in the WTP until the inspectors completed the tour. An exit interview with Ms. Danielson was held on-site after the inspection at approximately 1245 hours.

Treatment Scheme:

The Town of Springer WTP treats surface water from a reservoir on site. The facility serves a population of approximately 1,047 (US Census 2010) and the Springer Correctional Facility. The

reservoir has a spillway and associated drainage ditch leading toward the unnamed tributary south of the facility.

Raw water from the lower reservoir flows via gravity to a pump station and sent to the enclosed treatment plant. Raw water is treated by two Tonka package plants rated at 525,600 gallons per day each. Treatment processes are conventional and include coagulation, flocculation, sedimentation, filtration and disinfection. The treatment scheme consists of chemical injection followed by two parallel package units, each compartmentalized into two flocculation chambers, sedimentation basin, and multi-media filter. Depending on water demand or maintenance schedule, one or both of the package units may be placed into service at any time. Following filtration, water is disinfected with a MIOX disinfecting solution before distribution to the drinking water system.

At the head of the plant, aluminum sulfate and cationic polymer (poly diallyldimethylammonium chloride or pDADMAC) are injected into the raw water within the intake pipes and then flash mixed. Water flows into the flocculation chamber where horizontal paddle wheel mixers enhance the coagulation-flocculation process. Following the flocculation chamber, flow enters the sedimentation basin and is thrust up through tube settlers. The upward movement of water through the tube settlers allows each tube to function as a small settling basin. From the sedimentation basin, water enters a multi-media filtration unit for removal of remaining suspended solids. Filter backwashing begins automatically at a preset interval based on continuously monitored effluent turbidity levels. The operator may also manually backwash the filter media. Finished water is used to backwash the filters. Backwash water is flushed to a detention pond adjacent to the treatment building.

Prior to disinfection, emergency overflows from the package plant also flow to the backwash pond. Floor drains inside the treatment plant also flow to the backwash pond.

Further Explanations:

Note: The sections are arranged according to the format of the enclosed EPA Inspection Checklist (Form 3560-3), rather than being ranked in order of importance.

Section A - Permit Verification – Overall Rating of “Satisfactory”:

This is only a comment:

On review of the permit issued on November 1, 2013 with an expiration date of October 31, 2018, the name of the facility is “City of Springer Water Treatment Plant”. The correct name of the facility is “Town of Springer Water Treatment Plant”.

Section B – Recordkeeping and Reporting – Overall Rating of “Marginal”

The permit requires, in part III.C.4, Records Contents:

Records of monitoring information shall include:

- a. The date, exact place, and time of sampling or measurements;*
- b. The individual(s) who performed the sampling or measurements;*
- c. The date(s) and time(s) analyses were performed;*
- d. The individual(s) who performed the analyses;*
- e. The analytical techniques or methods used; and*
- f. The results of such analyses.*

The permit requires, in part II.B.2, 24-Hour Oral Reporting: Daily Maximum Limitation Violations:

Violations of daily maximum limitations for the following pollutants shall be reported orally to NMED only, within 24 hours from the time the permittee becomes aware of the violation followed by a written report within five days.

Total Aluminum

Total Residual Chlorine

Findings for Recordkeeping and Reporting:

The permittee has failed to provide the analytical technique being used for the analysis of Dissolved Oxygen (DO).

The permittee also has an analytical technique stated for Total Residual Chlorine (TRC) as "8067". This method is **not** an approved method under 40 CFR 136. Approved methods under 40 CFR 136 include:

Chlorine-Total residual, mg/L	Amperometric direct	4500-Cl D-2000	D1253-08
	Amperometric direct (low level)	4500-Cl E-2000	
	Iodometric direct	4500-Cl B-2000	
	Back titration ether end-point ¹⁵	4500-Cl C-2000	
	DPD-FAS	4500-Cl F-2000	
	Spectrophotometric, DPD	4500-Cl G-2000	
	Electrode		

The permittee has two contract laboratories. The permittee uses Raton Wastewater Treatment Plant Laboratory for analysis of Total Suspended Solids (TSS). They are required to monitor once per week when discharging. The permittee does not have Chain of Custody (COC) records for samples taken to Raton. The COC is used to verify the validity of the sample. Written records need to be provided to trace the custody of each sample. Included in the COC are signatures of the transferee (contract laboratory) the date and time, condition of the sample, and preservation technique used. The permittee should have COCs for every group or individual sample transferred to any person.

The permittee had an exceedance of Total Aluminum in January 2016. The permit limitation is 2.6 daily maximum. The permittee reported on NetDMR the results for Total Aluminum was 5.0 mg/L daily maximum. The permittee failed to notify NMED either in writing or telephone for this exceedance.

Section C – Operation and Maintenance – Overall Rating of "Satisfactory"

The permit requires in Part III, B.3 Proper Operation and Maintenance:

- a. *The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by permittee as efficiently as possible in a manner which will minimize upsets and discharges of excessive pollutants and in will achieve compliance with the conditions of this permit. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of backup or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of this permit.*
- b. *The permittee shall provide an adequate operating staff which is duly qualified to carry out operation, maintenance and testing functions required to insure compliance with the conditions of this permit.*

Findings for Operation and Maintenance:

The permittee does not have an emergency treatment plan in place at the facility.

The operator stated that she, Laura Danielson, plans to retire in the near future. This facility has only one certified operator. The Springer WTP needs to employ at least two certified operators to operate the facility and remain in compliance with the permit.

Section F – Laboratory – Overall Rating of “Unsatisfactory”

In Part III, Section C. 5, Monitoring Procedures:

- a. *Monitoring must be conducted according to test procedures approved under 40 CFR Part 136, unless other test procedures have been specified in this permit or approved by the regional administrator.*
- b. *The permittee shall calibrate and perform maintenance procedures on all monitoring and analytical instruments at intervals frequent enough to insure accuracy of measurements and shall maintain appropriate records of such activities.*
- c. *An adequate analytical quality control program, including the analyses of sufficient standards, spikes and duplicate samples to insure the accuracy of all required analytical results shall be maintained by the permittee or designated commercial laboratory.*

Findings for Laboratory:

The permittee is not using 40 CFR Part 136 approved methodology for Total Residual Chlorine. The bench sheets reviewed state method "8067" is being used to analyze TRC.

The permittee is not doing duplicate samples at least 10% of the time to verify precision of the laboratory.

NMED/SWQB
Official Photograph Log
Photo # 1

Photographer: Daniel Valenta	Date: July 7, 2016	Time: 1015 Hours
City/County: Town of Springer / Colfax County		State: New Mexico
Location: Town of Springer Water Treatment Plant		
Subject: Unlined backwash pond		



NMED/SWQB
Official Photograph Log
Photo # 2

Photographer: Daniel Valenta	Date: July 7, 2016	Time: 1027 Hours
City/County: Town of Springer / Colfax County		State: New Mexico
Location: Town of Springer Water Treatment Plant		
Subject: Discharge pipe from backwash pond		



NMED/SWQB
Official Photograph Log
Photo # 3

Photographer: Daniel Valenta	Date: July 7, 2016	Time: 1041 Hours
City/County: Town of Springer / Colfax County		State: New Mexico
Location: Town of Springer Water Treatment Plant		
Subject: Overview of rehabilitated dam		



NMED/SWQB
Official Photograph Log
Photo # 4

Photographer: Daniel Valenta	Date: July 7, 2016	Time: 1046 Hours
City/County: Town of Springer / Colfax County		State: New Mexico
Location: Town of Springer Water Treatment Plant		
Subject: Overview of spillway		

